

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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In re:

Wisconsin & Milwaukee Hotel LLC,

Case No. 24-21743-gmh  
Chapter 11

Debtor.

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**NOTICE AND APPLICATION OF DEBTOR  
FOR AUTHORITY TO RETAIN AND EMPLOY MALLERY SC  
AS SPECIAL COUNSEL FOR A SPECIFIC PURPOSE**

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Wisconsin & Milwaukee Hotel LLC, the debtor herein (“**Debtor**” or “**WMH**”), by its attorneys Richman & Richman LLC, by Michael P. Richman and Claire Ann Richman, hereby files this application for entry of an order authorizing the Debtor to employ and retain Mallery S.C., as special counsel for the Debtor for a specific purpose, pursuant to 11 U.S.C. §§ 327(e) and 330, Federal Rules of Bankruptcy Procedure 2014 and 2016, and Local Rule 2014 of the United States Bankruptcy Court for the Eastern District of Wisconsin. This Application is further supported by the Declaration of Christopher L. Strohbehn (“**Strohbehn Declaration**”), attached hereto and incorporated herein as **Exhibit A**, and the record herein.

**JURISDICTION AND VENUE**

1. The Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334, and the order of reference in this District entered pursuant to § 157(a). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper in this district pursuant to §§ 1408 and 1409.
2. The statutory predicates for relief sought in the Application are Sections

105(a), 327(e), 328, and 330 of the United States Bankruptcy Code (“**Bankruptcy Code**”), Rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”), and Local Rule 2014 of the United States Bankruptcy Court for the Eastern District of Wisconsin (the “**Local Rules**”).

## **BACKGROUND**

3. On April 9, 2024 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, commencing the above-captioned chapter 11 case (the “**Case**”).

4. The Debtor remains in possession of its property and is operating its business as a debtor in possession, pursuant to §§ 1107, 1108, 1184 of the Bankruptcy Code.

5. The Debtor owns and operates the Milwaukee Marriott Downtown, a 205-room full-service, high-end hotel located at 625 N. Milwaukee Street, Milwaukee (the “Hotel”).

6. The Debtor is plaintiff in a prepetition civil action filed on June 8, 2023 and currently pending in the Circuit Court of Milwaukee County, Milwaukee, Wisconsin, styled as *Wisconsin & Milwaukee Hotel LLC vs. City of Milwaukee*, Case No. 23-CV-4237, pursuant to which the Debtor is appealing (and seeking to reduce the amounts of) the City of Milwaukee’s property tax assessments of the Hotel for tax years 2022, 2023, and 2024 (the “**Property Tax Appeal**”). The law firm of Mallery SC (“**Mallery**”) has been representing the Debtor since 2021 with respect to the City of Milwaukee’s property tax assessments of the Hotel, and filed the Property Tax

Appeal on behalf of the Debtor on June 8, 2023. The Debtor wishes to engage them to continue the Property Tax Appeal because of their substantial background and involvement with the City of Milwaukee's property tax assessments of the Hotel, and the Property Tax Appeal, and because a successful outcome could be highly beneficial to the estate.

### **REQUESTED RELIEF**

7. Subject to the approval of this Application, the Debtor retained Mallory on May 13, 2024, to continue representing the Debtor in the Property Tax Appeal, as memorialized by an engagement agreement between the Debtor and Mallory ("Engagement Agreement"). A true and correct copy of the Engagement Agreement is attached to the Strohbehn Declaration as Exhibit I.

8. The Debtor believes that it is in the best interests of the estate to retain and employ Mallory to continue to represent it in the Property Tax Appeal, and Mallory is willing and able to continue representing the Debtor in the Property Tax Appeal.

9. Mallory is a diversified, full-service law firm based in Milwaukee, and the attorneys at Mallory are experienced in handling a broad range of the business and legal needs of its clients. Mallory's practice areas include property tax appeals, and Mallory's property tax team includes experienced attorneys who are familiar with navigating the complicated processes of challenging property tax assessments.<sup>1</sup>

10. The Debtor believes that Mallory has the experience and resources

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<sup>1</sup> <https://mallerysc.com/practice-areas/wisconsin-property-tax-appeal-lawyers/>

necessary to represent it in the Property Tax Appeal. In addition, Mallory already has significant background and experience in the Property Tax Appeal, which will continue to benefit the estate. Were the Debtor to seek to engage alternative counsel, it would be necessary to incur potentially significant fees and expenses for such new counsel to acquire the background and knowledge that Mallory already possesses. A successful result in the Property Tax Appeal has the potential to increase the value of the estate for the benefit of all parties in interest.

11. Pursuant to Section 327(e) of the Bankruptcy Code, a debtor in possession is authorized to employ "for a specified special purpose", an attorney "that has represented the debtor, if in the best interest of the estate, and if such attorney does not represent or hold any interest adverse to the debtor or to the estate with respect to the matter on which such attorney is to be employed. 11 U.S.C. § 327(e). Pursuant to Section 327 (e), four requirements must be met in order for the attorney's retention to be approved:

(1) the representation is in the best interest of the estate, (2) the attorney represented the debtor in the past, (3) the attorney is for a specific purpose approved by the court, other than to represent the debtor in conducting the case, and (4) the attorney does not represent or hold an interest adverse to the debtor or to the debtor's estate.

*See Stapleton v. Woodworkers Warehouse, Inc. (In re Woodworkers Warehouse, Inc.),* 332 B.R. 403, 406 (D. Del. 2005).

12. In light of the prepetition services Mallory has provided to the Debtor in the Property Tax Appeal, the Debtor submits that Mallory is well familiar with the Debtor, the City of Milwaukee's property tax assessments of the Hotel, and the Property Tax Appeal, and is well-qualified and uniquely able to act as an efficient

special counsel for the Debtor. By this Application, the Debtor respectfully requests that this Court enter an Order authorizing it to employ and retain Mallery as its special counsel, pursuant to Sections 327(e) and 330 of the Bankruptcy Code.

### **SCOPE OF EMPLOYMENT**

13. Local Rule 2014 of the Bankruptcy Court for this district provides that an application “must include a specific recitation of the anticipated services to be rendered together with the proposed method of calculating the compensation.” Mallery shall act as special counsel to the Debtor, including continuing to represent the Debtor in the Property Tax Appeal, and performing such legal services as may be required under the circumstances of the Property Tax Appeal that are deemed to be in the interests of the Debtor as set forth the Bankruptcy Code. The specific professional services that the Debtor expects that Mallery will continue to render in the Property Tax Appeal include, but shall not be limited to the following:

- a. preparing and reviewing pleadings, motions, and correspondence;
- b. appearing at and representing the Debtor in various proceedings before the Circuit Court of Milwaukee County, including status and scheduling conferences, motion hearings, and trials;
- c. conducting discovery, including conducting and defending depositions of parties and witnesses;
- d. conducting settlement negotiations as appropriate;
- e. handling case administration tasks and addressing procedural issues; and
- f. any other services as necessary as counsel for the Debtor in the Property Tax Appeal.

14. The Debtor's retention of Mallory is essential and should be authorized to avoid any disruption in the Debtor's efforts to prosecute the Property Tax Appeal.

## **COMPENSATION**

15. Compensation to Mallory will be calculated based on the work performed, billed at the hourly rates of Mallory attorneys and paraprofessionals, plus reimbursement of the actual and necessary expenses Mallory incurs, in accordance with the ordinary and customary rates which are in effect on the date the services are rendered, including, but not limited to, postage, filing and recording fees, court and governmental agency fees and charges, legal data base and connect charges, witness subpoena fees, expert witness and court reporter fees, travel expenses other than mileage, photocopies, and mileage fees (at the rate allowable for deduction by federal law), and other incidental costs advanced by Mallory specifically for these matters, at the rates commonly charged for such costs to other Mallory clients.

16. The names, positions, and current hourly rates of Mallory's professionals and paraprofessionals currently expected to have primary responsibility for providing services to the Debtor in the Property Tax Appeal are indicated in the following table.

Name	Title	Years Experience	Hourly Rate
Christopher L. Strohbehn	Shareholder	22	\$400 per hour
Russell J. Karnes	Shareholder	14	\$350 per hour
Paralegals/Support Staff		N/A	\$80 to \$150 per hour

17. Mallory may use the services of other attorneys, law clerks and

paraprofessionals at Mallery during the course of the Property Tax Appeal. If the services of other attorneys, law clerks and paraprofessionals not listed above are used, Mallery will charge the bankruptcy estate at the individual's current hourly rate for similar work. Mallery's hourly rates for other attorneys and paraprofessionals fall within the range of \$80 to \$500 per hour.

18. Mallery, as part of its ordinary business practice, periodically reviews and adjusts the hourly rates it charges for professional services. These adjustments typically occur at the beginning of each calendar year.

19. Mallery understands and agrees to keep detailed records of all time spent on these matters.

20. No fees shall be paid to Mallery except upon proper application to and approval by the Court.

21. The Debtor has determined that the rates charged by Mallery are reasonable given the work Mallery is expected to perform in the Property Tax Appeal.

**MALLERY DOES NOT HOLD OR REPRESENT  
ANY ADVERSE INTEREST**

22. To the best of the Debtor's knowledge, based upon the Strohbehn Declaration, Mallery does not have connections with the Debtor, its creditors, or any other party in interest in this Chapter 11 Case, nor the United States Trustee or any person employed in the Office of the United States Trustee, with the exception of the following:

- a) Since 2021, Mallery has represented, and continues to represent, Jackson Street Management LLC ("Jackson Street Management"), the majority

member of the Debtor, and an unsecured creditor of the Debtor, with regard to Jackson Street Management's business and corporate matters. The Debtor does not believe that such concurrent representation is a conflict of interest because the interests of the Debtor and Jackson Street Management are fully aligned in the Property Tax Appeal. Additionally, since 2021, Mallery has represented, and continues to represent, JS Asset Management LLC ("JS Asset Management"), an unsecured creditor of the Debtor, with regard to JS Asset Management's business and corporate matters. The Debtor believes that JS Asset Management and the Debtor's interests in the Property Tax Appeal are also fully aligned.

- b) Mallery represents Wave Renovations, LLC ("Wave Renovations"), a hotel construction/renovation project management company, with regard to Wave Renovations' business and corporate matters. Several members of Wave Renovations are also members of Jackson Street Management.
- c) Randall J. Erkert ("Erkert") is an equity shareholder with the Firm. Erkert is a member of Jackson Street Management.
- d) Mallery holds a prepetition claim against the Debtor in the amount of \$6,612.95 consisting of legal fees and expenses rendered by Mallery to the Debtor in the Property Tax Appeal.

23. While Mallery holds an unsecured claim against the Debtor with respect to services rendered prepetition, neither Mallery nor any professionals who are associated with, or are members of, Mallery possess or assert an economic interest

that would lessen the value of the Debtor's estate or that would create an actual or potential dispute against the estate. In addition, special purpose counsel under Section 327(e) is not required to be disinterested. *See In re J.S. II, L.L.C.*, 371 B.R. 311, 317 (Bankr. N.D. Ill. 2007). A specific purpose counsel is not required to be generally "disinterested" as required under Section 327(a). *See In re Film Ventures Int'l, Inc.*, 75 B.R. 250, 252 (B.A.P. 9th Cir. 1987) ("Section 372(e) contains less restrictive requirements than Section 372(a) which governs the employment of general counsel as there is no requirement of disinterestedness."). Thus, holding a prepetition claim should not disqualify an attorney from being special counsel. *In re Albert*, 206 B.R. 636, 642 n. 7 (Bankr. D. Mass. 1997) (finding that although proposed special counsel held a prepetition claim, he could still be employed as special counsel.) Here, pursuant to Sections 327(c) and (e), the Court need only determine whether Mallery holds an interest adverse to the estate, and it does not.

24. The interests of the Debtor and Mallery are aligned and identical with respect to the Property Tax Appeal, and therefore, Mallery does not represent any interest adverse to the Debtor or to the estate with respect to the matters for which Mallery will be providing advice and services as special counsel to the Debtor.

25. Therefore, to the best of Debtor's knowledge, based upon the Strohbehn Declaration, Mallery does not hold or represent any interest adverse to the Debtor or its estate with respect to the matters for which the Debtor wishes to employ Mallery.

## **NOTICE**

26. Pursuant to Local Rule 2014, notice of this Application will be served

upon the following of their respective counsel, (a) the United States Trustee for the Eastern District of Wisconsin; (b) Computershare Trust Company, N.A., the Debtor's primary secured lender; and (c) any other persons or parties designated by the Court.

27. The Debtor asserts that notice has been provided to all required parties through the filing of this application via the Court's CM/ECF system, and requests that if no objection or request for hearing is filed within **14 days of the filing of this Application**, that the Court grant the relief requested.

28. Subject to this Court's approval of this Application, Mallery has indicated that it is willing to serve as the Debtor's counsel in the Property Tax Appeal, and to perform the services described herein.

WHEREFORE, the Debtor requests an Order (a) granting this Application, (b) authorizing it to retain and employ Mallery SC as special counsel for a specific purpose, and (c) granting such other and further relief as this Court may deem just and proper.

Dated this 6<sup>th</sup> day of June 2024.

**RICHMAN & RICHMAN LLC**  
**Attorneys for Debtor**

By: /s/ Michael P. Richman  
Michael P. Richman  
Claire Ann Richman  
Eliza M. Reyes  
122 West Washington Avenue, Suite 850  
Madison, WI 53703  
Tel: (608) 630-8990/Fax: (608) 630-8991  
[mrichman@RandR.law](mailto:mrichman@RandR.law)  
[crichman@RandR.law](mailto:crichman@RandR.law)  
[ereyes@RandR.law](mailto:ereyes@RandR.law)

# EXHIBIT A

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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In re:

Wisconsin & Milwaukee Hotel LLC,

Case No. 24-21743-gmh  
Chapter 11

Debtor.

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**DECLARATION OF CHRISTOPHER L. STROHBEHN  
IN SUPPORT OF NOTICE AND APPLICATION OF DEBTOR  
FOR AUTHORITY TO RETAIN AND EMPLOY MALLERY SC  
AS SPECIAL COUNSEL FOR A SPECIFIC PURPOSE**

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I, Christopher L. Strohbehn, hereby declare as follows:

1. I am a shareholder with the law firm of Mallery SC ("Mallery" or the "Firm"), whose offices are located at 731 North Jackson Street, Suite 900, Milwaukee, Wisconsin, 53202. I submit this declaration in support of the Notice and Application of Debtor for Authority to Retain and Employ Mallery SC as Special Counsel for a Specific Purpose ("Application") for Wisconsin & Milwaukee Hotel LLC, the debtor herein ("Debtor" or "WMH").
2. Unless otherwise stated, the facts set forth herein are based on my personal knowledge, upon records maintained by Mallery in the ordinary course of business, and which have been reviewed by me or other Mallery attorneys or employees at my direction, or upon information provided to me by other Mallery attorneys or employees. To the extent any information disclosed in this declaration requires amendment or modification as additional information becomes available, a supplemental declaration will be submitted to the court.

3. The Debtor is plaintiff in the prepetition civil action filed on June 8, 2023 and currently pending in the Circuit Court of Milwaukee County, Milwaukee, Wisconsin, styled as *Wisconsin & Milwaukee Hotel LLC vs. City of Milwaukee*, Case No. 23-CV-4237, pursuant to which the Debtor is appealing (and seeking to reduce the amounts of) the City of Milwaukee's property tax assessments of the Hotel for tax years 2022, 2023, and 2024 (the "Property Tax Appeal").

4. Mallery has been representing the Debtor with respect to the assessment of real and personal property taxes by the City of Milwaukee since 2021. Mallery filed the Property Tax Appeal on behalf of the Debtor on June 8, 2023, and the Debtor desires to retain and employ Mallery as special counsel to the Debtor to continue to represent the Debtor in the Property Tax Appeal.

5. Subject to the approval of the Application, the Debtor retained Mallery on May 13, 2024, to continue representing the Debtor in the Property Tax Appeal, as memorialized by an engagement agreement between the Debtor and Mallery ("Engagement Agreement"). A true and correct copy of the Engagement Agreement is attached hereto and incorporated herein as **Exhibit I**.

6. Given its background and involvement in the Property Tax Appeal prior to the commencement of this chapter 11 case, and the benefit to the estate if the case results in a reduction of the Debtor's property taxes, the Debtor believes that it is in the best interests of the estate to retain and employ Mallery to continue to represent it in the Property Tax Appeal, and Mallery is willing and able to continue representing the Debtor in the Property Tax Appeal.

7. Mallery is a diversified, full-service law firm based in Milwaukee, and the attorneys at Mallery are experienced in handling a broad range of the business and legal needs of its clients. Mallery's practice areas include property tax appeals, and Mallery's property tax team includes experienced attorneys who are familiar with navigating the complicated processes of challenging property tax assessments.

8. The specific professional services that the Debtor expects that Mallery will continue to render in the Property Tax Appeal include, but shall not be limited to the following:

- a. preparing and reviewing pleadings, motions, and correspondence;
- b. appearing at and representing the Debtor in various proceedings before the Circuit Court of Milwaukee County, including status and scheduling conferences, motion hearings, and trials;
- c. conducting discovery, including conducting and defending depositions of parties and witnesses;
- d. conducting settlement negotiations as appropriate;
- e. handling case administration tasks and addressing procedural issues; and
- f. any other services as necessary as counsel for the Debtor in the Property Tax Appeal.

9. The Debtor's retention of Mallery is essential and should be authorized to avoid any disruption in the Debtor's efforts to prosecute the Property Tax Appeal.

10. Compensation to Mallery will be calculated based on the work performed, billed at the hourly rates of Mallery attorneys and paraprofessionals, plus reimbursement of the actual and necessary expenses Mallery incurs, in accordance

with the ordinary and customary rates which are in effect on the date the services are rendered, including, but not limited to, postage, filing and recording fees, court and governmental agency fees and charges, legal data base and connect charges, witness subpoena fees, expert witness and court reporter fees, travel expenses other than mileage, photocopies, and mileage fees (at the rate allowable for deduction by federal law), and other incidental costs advanced by Mallery specifically for these matters, at the rates commonly charged for such costs to other Mallery clients.

11. The names, positions, and current hourly rates of Mallery's professionals and paraprofessionals currently expected to have primary responsibility for providing services to the Debtor in the Property Tax Appeal are indicated in the following table.

Name	Title	Years Experience	Hourly Rate
Christopher L. Strohbehn	Shareholder	22	\$400 per hour
Russell J. Karnes	Shareholder	14	\$350 per hour
Paralegals/Support Staff		N/A	\$80 to \$150 per hour

12. Mallery may use the services of other attorneys, law clerks and paraprofessionals at Mallery during the course of the Property Tax Appeal. If the services of other attorneys, law clerks and paraprofessionals not listed above are used, Mallery will charge the bankruptcy estate at the individual's current hourly rate for similar work. Mallery's hourly rates for other attorneys and paraprofessionals fall within the range of \$80 to \$500 per hour. Mallery, as part of its ordinary business practice, periodically reviews and adjusts the hourly rates it charges for professional services. These adjustments typically occur at the beginning

of each calendar year.

13. Mallery understands and agrees to keep detailed records of all time spent on these matters.

14. No fees shall be paid to Mallery except upon proper application to and approval by the Court.

15. In connection with the Debtor's proposed retention of Mallery to continue its representation in the Property Tax Litigation, and in preparing this Declaration, Mallery employees, under my supervision, conducted a search of Mallery's internal "conflicts" database for each of the following entities (collectively, the "**Search Parties**"). The list of the Search Parties is attached hereto and incorporated herein as Exhibit II.

- the Debtor's equity holders;
- the Debtor's management;
- the Debtor's secured and unsecured creditors; and
- other parties in interest.

16. To the best of my knowledge, information, and belief, and in accordance with Bankruptcy Rule 5002, neither I, nor any attorney at Mallery is a relative of any of the United States Bankruptcy Judges who may be assigned to this case. To the best of my knowledge, information, and belief, Mallery does not have connections with the Debtor, its creditors, or any other party in interest in this Chapter 11 Case, , nor the United States Trustee or any person employed in the Office of the United States Trustee, with the exception of the following:

- a) Since 2021, Mallery has represented, and continues to represent, Jackson Street Management LLC (“**Jackson Street Management**”), the majority member of the Debtor, and an unsecured creditor of the Debtor, with regard to Jackson Street Management’s business and corporate matters. I do not believe that such concurrent representation is a conflict of interest because the interests of the Debtor and Jackson Street Management are fully aligned in the Property Tax Appeal. Additionally, since 2021, Mallery has represented, and continues to represent, JS Asset Management LLC (“**JS Asset Management**”), an unsecured creditor of the Debtor, with regard to JS Asset Management’s business and corporate matters. I believe that JS Asset Management and the Debtor’s interests in the Property Tax Appeal are also fully aligned.
- b) Mallery represents Wave Renovations, LLC (“**Wave Renovations**”), a hotel construction/renovation project management company, with regard to Wave Renovations’ business and corporate matters. Several members of Wave Renovations are also members of Jackson Street Management.
- c) Randall J. Erkert (“**Erkert**”) is an equity shareholder with the Firm. Erkert is a member of Jackson Street Management.
- d) Mallery holds a prepetition claim against the Debtor in the amount of \$6,612.95 consisting of legal fees and expenses rendered by Mallery to the Debtor in the Property Tax Appeal.

17. After reviewing the conflicts search, as far as I have been able to

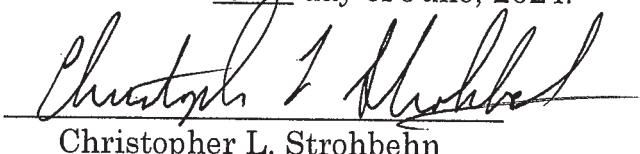
determine after reasonable inquiry, neither I, nor Mallory, including any of its partners, counsel, associates or any other professional person employed by Mallory, holds or represents any interest adverse to the Debtor or its estate with respect to matters on which Mallory is proposed to be retained as special counsel.

18. To the extent that Mallory holds an unsecured claim against the Debtor with respect to services rendered prepetition, I believe that neither Mallory nor any professionals who are associated with, or are members of, Mallory possess or assert an economic interest that would lessen the value of the Debtor's estate or that would create an actual or potential dispute against the estate. The interests of the Debtor and Mallory are aligned and identical with respect to the Property Tax Appeal, and therefore, I believe that Mallory does not represent any interest adverse to the Debtor or to the estate with respect to the matters for which Mallory will be providing advice and services as special counsel to the Debtor.

19. Mallory has not agreed to share any compensation received in connection with this proceeding with any entity other than its members, counsel, or associates in accordance with 11 U.S.C. § 504(b).

I declare under penalty of perjury under the laws of the United States that, based upon my knowledge, information and belief as set forth in this Declaration, the foregoing is true and correct to the best of my knowledge.

Executed in Milwaukee, Wisconsin this 6<sup>th</sup> day of June, 2024.



Christopher L. Strohbehn  
Christopher L. Strohbehn

# EXHIBIT I

# MALLERY sc

A LIMITED LIABILITY SERVICE CORPORATION

Christopher L. Strohbehn  
Direct Telephone: 414-727-6291  
Email: cstrohbehn@mallerysc.com

May 13, 2024

***VIA EMAIL (rerkert@mallerysc.com)***

Randall G. Erkert  
Wisconsin & Milwaukee Hotel LLC  
731 N. Jackson Street, Suite 420  
Milwaukee, WI 53202

Dear Mr. Erkert:

Re: Engagement Terms  
Wisconsin & Milwaukee Hotel LLC– Property  
Tax Appeal

The Wisconsin Supreme Court requires attorneys to send to each new client a written description of the scope of services and basis of payment.

As we discussed, my firm and I are willing to represent Wisconsin & Milwaukee Hotel LLC, regarding a property tax appeal related to the 2022, 2023 and 2024 assessments of parcel numbers 396-0471-000 which is currently subject of litigation in Milwaukee County Circuit Court case no. 23-CV04237. Like most law firms, Mallery s.c. charges for services on an hourly basis and for expenses and advances. Our basic billing and engagement policies are described on the enclosed document entitled “Engagement Terms.”

I currently bill at the rate of \$400 per hour for matters of this nature. My colleague, Russ Karnes, bills at the rate of \$350 per hour. I might involve other lawyers and legal assistants at my firm if I can reduce the fees we charge because of their lower rates if their involvement would add to the efficiency of your representation or if their experience would be useful. A list of the current billing rates for attorneys at Mallery s.c. is attached to this letter. These rates may change on or about January 1 of each year.

Mallery s.c. is organized as a limited liability service corporation under the laws of Wisconsin. The firm is responsible for professional liabilities incurred by its attorneys. Each attorney also may be personally liable for any acts, errors, or omissions arising out of the performance of professional services. The firm maintains professional liability insurance as required by the Rules of Professional Conduct of the Wisconsin Supreme Court.

If the terms of this letter, as well as the Engagement Terms, are acceptable to you, please acknowledge your agreement below and return an executed copy to me. Upon my receipt of an acknowledged copy of this letter, whether by mail, facsimile or otherwise, this letter and the Engagement Terms will constitute the contract between Mallery s.c. and you. If you have any questions or concerns, please call me.

While this letter describes the terms of the engagement for the specific matter described above, the general terms of this letter and the Engagement Terms will apply, unless otherwise agreed in writing, to this and all future projects for which we perform services for you, or any entity owned by or affiliated with you.

Thank you for allowing my law firm and me to be of service.

Sincerely,



CHRISTOPHER L. STROHBEHN

Enclosure

Acknowledged and agreed to as of \_\_\_\_\_, 2024:

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Wisconsin & Milwaukee Hotel LLC  
Authorized Agent or Representative

4876-9193-5934, v. 1

## **ENGAGEMENT TERMS – 2024**

### **MALLERY s.c.**

#### **I. Rates**

Our current ordinary billing rates range from \$200 to \$500 per hour for attorneys and \$80 to \$150 per hour for legal assistants performing paralegal work. Rates are based on experience levels and areas of practice. Our rates are subject to annual, year-end adjustments which are ordinarily in the \$5 to \$10 per hour range, but which might be more or less than this range. A current list of our rates is attached. Upon written request, we will provide a list of revised rates to ongoing clients when changes are made.

#### **II. Expenses and Advances**

Expenses and advances include without limitation (a) costs for messenger services, overnight courier charges (such as UPS and Federal Express), postage, service-of-process charges, filing and recording fees, court and governmental agency fees and charges, legal data base and connect charges, witness subpoena fees, expert witness and court reporter fees, travel expenses other than mileage and similar items based on our actual costs, and (b) photocopies at the rate of \$0.15 per page when we make the copies, photocopies at our actual cost if we pay copy services, the court or other parties for the copies, long distance facsimiles at the rate of \$0.10 per page and mileage fees at the rate allowable for deduction by federal law. We believe that these charges compensate us for our approximate expenses and advances in connection with the client's representation. Of course, not all of these charges will apply on any given project. However, if the amount of any advance exceeds \$100, we may in our discretion ask that the client pay the item directly. Of course, if the client fails to do so, we reserve the right to pay the item and bill the client for it.

#### **III. Frequency of Invoices**

We generally bill on a monthly basis; however, this is only a rough rule of thumb, and we reserve the right to bill less or more frequently. For certain projects, particularly projects that we expect will have a total invoice of less than \$2,500 or shorter term matters, we may at our discretion bill upon the completion of the project.

#### IV. Late Payments/Failures to Pay

Payments are due within 10 days of the date mailed to the client. Notwithstanding the foregoing, unless otherwise agreed in writing, if any invoice is not paid on or before the day 30 days after the date the invoice is mailed to a client, we reserve the right to (a) charge interest on a daily basis from the date due until paid at the rate of 15% per year on all amounts described on the invoice; and (b) rescind any discount described on the invoice. If the client is unable to pay the amount of the invoice when due, the client should, before the invoice is due, call the attorney with whom the client is working to see if we are amenable to other arrangements.

#### V. Withdrawal

The client will not object to our withdrawal as counsel if the client fails to make payments pursuant to the terms of our agreement with the client, the client requires that we act in a manner that we deem to be illegal or unethical or, if the engagement involves litigation, the client insists on pursuing a claim that we do not believe has merit. Any unused portion of any deposit will be returned to the client at the time of our withdrawal.

#### VI. Collection/Attorneys' Lien

If we commence a collection action for the amounts payable to us and we obtain an award or judgment against the client in such action, we will charge the client, and the client agrees to pay, for our fees and expenses in connection with such action. Such charge may be included in the amount of the award or judgment. Additionally, by accepting the terms of our engagement, the client grants to us, to secure the payment of our fees and expenses, a lien on all of the client's files, papers and other materials in our possession, any deposits in our possession and on the proceeds of any action in which we have represented the client.

#### VII. Files and Materials in Our Possession

Unless otherwise agreed in writing, we will assume that all documents and other materials that come into our possession are duplicates and are delivered to us for our use in representing the client. This assumption shall hold true even if the documents and materials purport to be originals or contain original signatures. Accordingly, we shall have the right, without further notice, to destroy our files and their contents, including our work product, for any project on which we have performed no legal services for the client for a period of at least six consecutive years. During the period we maintain files for the client, we will provide copies or originals, upon written request, of any documents and materials in the file provided the client pays for our time and copying expenses and advances at the rates set forth above, including the expenses and advances of making copies for our files of any original materials requested by the client. If we no longer provide services for the client at the time of the request, we have the right to require the client to prepay for such time and copying.

## **2024 Hourly Billing Rates**

### Shareholders

Adam A. Bardosy	\$395
Randall G. Erkert	\$360
Catherine A Faught	\$395
Andrew G. Frank	\$390
Douglas G. French	\$480
Jon S. Herreman	\$450
Jacqueline G. Hrovat	\$400
Russell J. Karnes	\$350
Ajay V. Kuttempoor	\$450
Michael A. Marx	\$395
Michael J. McDonagh	\$500
Andrew Robinson	\$350
Christopher L. Strohbehn	\$400

### Associates

Maggie L. Seifert	\$300
Stephen L. Lovell	\$200
Samantha S. Bailey	\$250

### Paralegals/Legal Assistants

Jeanne Demet	\$150
Mary Ellen Panzer	\$80
Alexandra Wells	\$80
Caroline Tietjens	\$150
Jessica Watson	\$150

4859-6624-1982, v. 1

# EXHIBIT II

Fill in this information to identify the case:

Debtor name **Wisconsin & Milwaukee Hotel LLC**

United States Bankruptcy Court for the: **EASTERN DISTRICT OF WISCONSIN**

Case number (if known) **24-21743**

Check if this is an amended filing

## Official Form 206D

### Schedule D: Creditors Who Have Claims Secured by Property

12/15

Be as complete and accurate as possible.

#### 1. Do any creditors have claims secured by debtor's property?

No. Check this box and submit page 1 of this form to the court with debtor's other schedules. Debtor has nothing else to report on this form.

Yes. Fill in all of the information below.

#### Part 1: List Creditors Who Have Secured Claims

2. List in alphabetical order all creditors who have secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim.

##### 2.1 City of Milwaukee

Creditor's Name

**Office of the City Treasurer  
Customer Services  
Division  
PO Box 514062  
Milwaukee, WI 53203-3462**

Creditor's mailing address

Describe debtor's property that is subject to a lien

**Full-service high-end hotel known as the  
Milwaukee Marriott Downtown  
625 N. Milwaukee Street  
Milwaukee, WI 53202**

Column A

Amount of claim

Do not deduct the value  
of collateral.

**\$549,089.87**

Column B

Value of collateral  
that supports this  
claim

**\$26,400,000.00**

Creditor's email address, if known

Date debt was incurred

**December 31, 2023**

Last 4 digits of account number

Describe the lien

**Real Estate Taxes - Tax Year 2023**

Is the creditor an insider or related party?

No

Yes

Is anyone else liable on this claim?

No

Yes. Fill out Schedule H: Codebtors (Official Form 206H)

Do multiple creditors have an  
interest in the same property?

No

Yes. Specify each creditor,  
including this creditor and its relative  
priority.

**1. Computershare Trust  
Company, N.A.  
2. Wisconsin & Milwaukee  
Hotel Funding, LLC  
3. City of Milwaukee**

As of the petition filing date, the claim is:

Check all that apply

Contingent  
 Unliquidated  
 Disputed

##### 2.2 Computershare Trust Company, N.A.

Creditor's Name

**250 Royall Street  
Canton, MA 02021**

Creditor's mailing address

Describe debtor's property that is subject to a lien

**All real and personal property of the Debtor.**

**\$46,288,403.25**

**\$26,400,000.00**

Creditor's email address, if known

Describe the lien

**Mortgage**

Is the creditor an insider or related party?

No

Yes

Is anyone else liable on this claim?

Debtor **Wisconsin & Milwaukee Hotel LLC**  
Name

Case number (if known) **24-21743**

Date debt was incurred

**August 31, 2012**

Last 4 digits of account number  
**unknown**

Do multiple creditors have an  
interest in the same property?

No

Yes. Specify each creditor,  
including this creditor and its relative  
priority.

**Specified on line 2.1**

No

Yes. Fill out Schedule H: Codebtors (Official Form 206H)

As of the petition filing date, the claim is:

Check all that apply

Contingent  
 Unliquidated  
 Disputed

**2.3 Wisconsin & Milwaukee  
Hotel Funding, LLC**

Creditor's Name:

**311 E. Chicago Street  
Suite 510  
Milwaukee, WI 53202**

Creditor's mailing address

Creditor's email address, if known

Date debt was incurred

Last 4 digits of account number

Do multiple creditors have an  
interest in the same property?

No

Yes. Specify each creditor,  
including this creditor and its relative  
priority.

**Specified on line 2.1**

**\$2,000,000.00**

**\$26,400,000.00**

Describe debtor's property that is subject to a lien

**Full-service high-end hotel known as the  
Milwaukee Marriott Downtown  
625 N. Milwaukee Street  
Milwaukee, WI 53202**

Describe the lien

**Mortgage**

Is the creditor an insider or related party?

No

Yes

Is anyone else liable on this claim?

No

Yes. Fill out Schedule H: Codebtors (Official Form 206H)

As of the petition filing date, the claim is:

Check all that apply

Contingent  
 Unliquidated  
 Disputed

3. Total of the dollar amounts from Part 1, Column A, including the amounts from the Additional Page, if any.

**\$48,837,493.**

**12**

**Part 2: List Others to Be Notified for a Debt Already Listed in Part 1**

List in alphabetical order any others who must be notified for a debt already listed in Part 1. Examples of entities that may be listed are collection agencies, assignees of claims listed above, and attorneys for secured creditors.

If no others need to be notified for the debts listed in Part 1, do not fill out or submit this page. If additional pages are needed, copy this page.

Name and address

On which line in Part 1 did  
you enter the related creditor?

Last 4 digits of  
account number for  
this entity

**City of Milwaukee  
City Hall  
200 E. Wells Street  
Room 800  
Milwaukee, WI 53202**

Line 2.1

**Wisconsin Housing & Economic Development  
Authority (WHEDA)  
611 W. National Avenue  
Milwaukee, WI 53204**

Line 2.2

**unknown**

Fill in this information to identify the case:

Debtor name **Wisconsin & Milwaukee Hotel LLC**

United States Bankruptcy Court for the: **EASTERN DISTRICT OF WISCONSIN**

Case number (if known) **24-21743**

Check if this is an amended filing

## Official Form 206E/F

### Schedule E/F: Creditors Who Have Unsecured Claims

12/15

Be as complete and accurate as possible. Use Part 1 for creditors with PRIORITY unsecured claims and Part 2 for creditors with NONPRIORITY unsecured claims. List the other party to any executory contracts or unexpired leases that could result in a claim. Also list executory contracts on *Schedule A/B: Assets - Real and Personal Property* (Official Form 206A/B) and on *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G). Number the entries in Parts 1 and 2 in the boxes on the left. If more space is needed for Part 1 or Part 2, fill out and attach the Additional Page of that Part included in this form.

#### Part 1: List All Creditors with PRIORITY Unsecured Claims

1. Do any creditors have priority unsecured claims? (See 11 U.S.C. § 507).

No. Go to Part 2.

Yes. Go to line 2.

#### Part 2: List All Creditors with NONPRIORITY Unsecured Claims

3. List in alphabetical order all of the creditors with nonpriority unsecured claims. If the debtor has more than 6 creditors with nonpriority unsecured claims, fill out and attach the Additional Page of Part 2.

Amount of claim

3.1	Nonpriority creditor's name and mailing address <b>Access One Inc.</b> <b>820 W Jackson Blvd.</b> <b>6th Floor</b> <b>Chicago, IL 60607</b> Date(s) debt was incurred _____ Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  <b>Basis for the claim: Trade Creditor - materials or services</b> Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$213.27</b>
3.2	Nonpriority creditor's name and mailing address <b>Airgas USA LLC</b> <b>259 North Radnor-Chester Road</b> <b>Suite 100</b> <b>Radnor, PA 19087-5283</b> Date(s) debt was incurred _____ Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  <b>Basis for the claim: Trade Creditor - materials or services</b> Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$1,268.81</b>
3.3	Nonpriority creditor's name and mailing address <b>Akrit Sales &amp; Service, Inc.</b> <b>17300 W. Cleveland Avenue</b> <b>New Berlin, WI 53146</b> Date(s) debt was incurred _____ Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  <b>Basis for the claim: Trade Creditor - materials or services</b> Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$929.45</b>
3.4	Nonpriority creditor's name and mailing address <b>Alliance Laundry Systems Distribution</b> <b>PO Box 844226</b> <b>Dallas, TX 75284-4226</b> Date(s) debt was incurred _____ Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  <b>Basis for the claim: Trade Creditor - materials or services</b> Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$574.72</b>

3.5	Nonpriority creditor's name and mailing address <b>ALSCO Inc.</b> <b>505 East 200 South</b> <b>Salt Lake City, UT 84102</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$1,792.93</b>
3.6	Nonpriority creditor's name and mailing address <b>ASSA Abloy Global Solutions</b> <b>PO Box 70340</b> <b>SE-107 23</b> <b>Stockholm, Sweden</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$291.24</b>
3.7	Nonpriority creditor's name and mailing address <b>Boelter Companies</b> <b>PO Box 734296</b> <b>Chicago, IL 60673-4296</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$357.08</b>
3.8	Nonpriority creditor's name and mailing address <b>BOSS Beer Line Cleaning</b> <b>PO Box 486</b> <b>Germantown, WI 53022</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$310.76</b>
3.9	Nonpriority creditor's name and mailing address <b>Canon Solutions America, Inc.</b> <b>One Canon Park</b> <b>Melville, NY 11747</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$385.71</b>
3.10	Nonpriority creditor's name and mailing address <b>Carisolo Inc.</b> <b>Carisolo Grinding Service</b> <b>E7995 School Road</b> <b>Sauk City, WI 53583</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$72.84</b>
3.11	Nonpriority creditor's name and mailing address <b>Cintas</b> <b>N56 W13605 Silver Spring Drive</b> <b>Menomonee Falls, WI 53051</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$4,902.44</b>

3.12	Nonpriority creditor's name and mailing address <b>Courtesy Products, Inc.</b> 10840 Linpage Place Saint Louis, MO 63132	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$5,663.82</b>
	Date(s) debt was incurred _____	<input type="checkbox"/> Contingent	
	Last 4 digits of account number <u>unknown</u>	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
3.13	Nonpriority creditor's name and mailing address <b>Coyle Hospitality Services, Inc.</b> 244 Madison Avenue Suite 369 New York, NY 10016	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$248.61</b>
	Date(s) debt was incurred _____	<input type="checkbox"/> Contingent	
	Last 4 digits of account number _____	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
3.14	Nonpriority creditor's name and mailing address <b>CVENT</b> PO Box 822699 Philadelphia, PA 19182-2699	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$10,524.00</b>
	Date(s) debt was incurred _____	<input type="checkbox"/> Contingent	
	Last 4 digits of account number _____	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
3.15	Nonpriority creditor's name and mailing address <b>Deluxe Branded Marketing</b> PO Box 645633 Cincinnati, OH 45264-5633	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$2,281.02</b>
	Date(s) debt was incurred _____	<input type="checkbox"/> Contingent	
	Last 4 digits of account number _____	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
3.16	Nonpriority creditor's name and mailing address <b>Ecolab Institutional</b> PO Box 70343 Chicago, IL 60673	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$2,238.00</b>
	Date(s) debt was incurred _____	<input type="checkbox"/> Contingent	
	Last 4 digits of account number _____	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
3.17	Nonpriority creditor's name and mailing address <b>Ecolab Pest Elimination Division</b> 25252 Network Place Chicago, IL 60673-1262	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$82.00</b>
	Date(s) debt was incurred _____	<input type="checkbox"/> Contingent	
	Last 4 digits of account number _____	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
3.18	Nonpriority creditor's name and mailing address <b>Edward Don and Company</b> 2562 Paysphere Circle Chicago, IL 60674	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$1,160.92</b>
	Date(s) debt was incurred _____	<input type="checkbox"/> Contingent	
	Last 4 digits of account number _____	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	

Debtor	<b>Wisconsin &amp; Milwaukee Hotel LLC</b>	Case number (if known)	<b>24-21743</b>
Name			
3.19	Nonpriority creditor's name and mailing address  <b>FAXPIPE</b> <b>AIRCOM LLC DBA AIRCOMUSA</b> <b>190 W. 800 N Street</b> <b>Suite 202</b> <b>Provo, UT 84601</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$12.95</b>
<input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed			
<b>Basis for the claim: Trade Creditor - materials or services</b>			
Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
3.20	Nonpriority creditor's name and mailing address  <b>Fitzgerald Consultancy</b> <b>44 East Mifflin Street</b> <b>Suite 305</b> <b>Madison, WI 53703</b>  Date(s) debt was incurred <u>11/30/2023 - 3/31/2024</u>  Last 4 digits of account number <u>None</u>	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$2,500.00</b>
<input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed			
<b>Basis for the claim: Trade Creditor - materials or services</b>			
Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
3.21	Nonpriority creditor's name and mailing address  <b>Fortune Fish Company</b> <b>Lockbox 235263</b> <b>Chicago, IL 60689-5263</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$8,721.17</b>
<input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed			
<b>Basis for the claim: Trade Creditor - materials or services</b>			
Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
3.22	Nonpriority creditor's name and mailing address  <b>Four Peas Consulting</b> <b>PO Box 101</b> <b>Eau Claire, WI 54702</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$1,000.00</b>
<input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed			
<b>Basis for the claim: Trade Creditor - materials or services</b>			
Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
3.23	Nonpriority creditor's name and mailing address  <b>Grainger Inc.</b> <b>Dept 843980004</b> <b>Palatine, IL 60038-0001</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$2,104.29</b>
<input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed			
<b>Basis for the claim: Trade Creditor - materials or services</b>			
Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
3.24	Nonpriority creditor's name and mailing address  <b>Guest Supply LLC</b> <b>PO Box 6771</b> <b>300 Davidson Avenue</b> <b>Somerset, NJ 08873</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$2,145.65</b>
<input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed			
<b>Basis for the claim: Trade Creditor - materials or services</b>			
Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
3.25	Nonpriority creditor's name and mailing address  <b>Guest Tek Interactive</b> <b>1060 Lake Susan Drive</b> <b>Chanhassen, MN 55317</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$3,947.19</b>
<input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed			
<b>Basis for the claim: Trade Creditor - materials or services</b>			
Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Debtor	Wisconsin & Milwaukee Hotel LLC	Case number (if known)	24-21743
3.26	Nonpriority creditor's name and mailing address <b>J.M. Brennan Inc.</b> 2101 W. St. Paul Avenue Milwaukee, WI 53233  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	\$3,052.00
3.27	Nonpriority creditor's name and mailing address <b>Jackson Street Management LLC</b> 731 N. Jackson Street Suite 420 Milwaukee, WI 53202  Date(s) debt was incurred <u>5/8/2020, 11/30/2020,</u> <u>12/11/2020, 12/28/2020</u>  Last 4 digits of account number <u>None</u>	As of the petition filing date, the claim is: Check all that apply.	\$414,166.66
3.28	Nonpriority creditor's name and mailing address <b>JLL</b> 200 East Randolph Drive 43 Floor Chicago, IL 60601  Date(s) debt was incurred <u>11/30/2023 - 3/31/2024</u>  Last 4 digits of account number <u>None</u>	As of the petition filing date, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	\$59,922.83
3.29	Nonpriority creditor's name and mailing address <b>JS Asset Management LLC</b> 731 N. Jackson Street Suite 420 Milwaukee, WI 53202  Date(s) debt was incurred <u>12/1/2019 to 9/30/2021</u>  Last 4 digits of account number <u>None</u>	As of the petition filing date, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Operating Loan</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	\$58,719.69
3.30	Nonpriority creditor's name and mailing address <b>JS Asset Management LLC</b> 731 N. Jackson Street Suite 420 Milwaukee, WI 53202  Date(s) debt was incurred <u>1/1/2020 - 2/29/2024</u>  Last 4 digits of account number <u>None</u>	As of the petition filing date, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Accrued Asset Management Fees</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	\$296,693.94
3.31	Nonpriority creditor's name and mailing address <b>JS Asset Management LLC</b> 731 N. Jackson Street Suite 420 Milwaukee, WI 53202  Date(s) debt was incurred <u>5/8/2020</u>  Last 4 digits of account number <u>None</u>	As of the petition filing date, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: _____  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	\$511,857.00
3.32	Nonpriority creditor's name and mailing address <b>Knot Worldwide Inc.</b> PO Box 32177 New York, NY 10087-2177  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	\$1,386.00

3.33	Nonpriority creditor's name and mailing address <b>Marriott International, Inc.</b> <b>7750 Wisconsin Avenue</b> <b>Bethesda, MD 20814</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Franchise Fees</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$129,190.31</b>
3.34	Nonpriority creditor's name and mailing address <b>Martin Sourcing &amp; Logistics LLC</b> <b>533 Jackson Way</b> <b>Pevely, MO 63070</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$819.00</b>
3.35	Nonpriority creditor's name and mailing address <b>Meats by Linz, Inc.</b> <b>PO Box 59</b> <b>414 E. State Street</b> <b>Calumet City, IL 60409-0059</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$1,254.24</b>
3.36	Nonpriority creditor's name and mailing address <b>Milwaukee Pretzel Company</b> <b>8050 N. Granville Woods Road</b> <b>Milwaukee, WI 53223</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$297.60</b>
3.37	Nonpriority creditor's name and mailing address <b>Milwaukee World Festival</b> <b>BIN 88485</b> <b>639 E. Summerrfest Place</b> <b>Milwaukee, WI 53202</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$10,000.00</b>
3.38	Nonpriority creditor's name and mailing address <b>Playback Prodigy</b> <b>PO Box 70838</b> <b>Las Vegas, NV 89170-0838</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$200.00</b>
3.39	Nonpriority creditor's name and mailing address <b>Restaurant Technologies, Inc.</b> <b>12962 Collections Center Drive</b> <b>Chicago, IL 60693</b>  Date(s) debt was incurred _____  Last 4 digits of account number _____	As of the petition filing date, the claim is: <i>Check all that apply.</i> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed  Basis for the claim: <b>Trade Creditor - materials or services</b>  Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	<b>\$1,399.69</b>

Debtor	Name	Case number (if known)	24-21743
3.40	<p>Nonpriority creditor's name and mailing address  <b>RR Donnelley</b>  <b>55111 S 9th Street</b>  <b>Milwaukee, WI 53221</b></p> <p>Date(s) debt was incurred _____</p> <p>Last 4 digits of account number _____</p>	<p>As of the petition filing date, the claim is: <i>Check all that apply.</i></p> <p><input type="checkbox"/> Contingent  <input type="checkbox"/> Unliquidated  <input type="checkbox"/> Disputed</p> <p>Basis for the claim: <b>Trade Creditor - materials or services</b></p> <p>Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p>	<b>\$312.09</b>
3.41	<p>Nonpriority creditor's name and mailing address  <b>State Chemical Solutions</b>  <b>PO Box 844284</b>  <b>Boston, MA 02284-4284</b></p> <p>Date(s) debt was incurred _____</p> <p>Last 4 digits of account number _____</p>	<p>As of the petition filing date, the claim is: <i>Check all that apply.</i></p> <p><input type="checkbox"/> Contingent  <input type="checkbox"/> Unliquidated  <input type="checkbox"/> Disputed</p> <p>Basis for the claim: <b>Trade Creditor - materials or services</b></p> <p>Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p>	<b>\$1,324.01</b>
3.42	<p>Nonpriority creditor's name and mailing address  <b>Tambourine</b>  <b>100 W. Cypress Creek Road</b>  <b>Suite 550</b>  <b>Fort Lauderdale, FL 33309</b></p> <p>Date(s) debt was incurred _____</p> <p>Last 4 digits of account number _____</p>	<p>As of the petition filing date, the claim is: <i>Check all that apply.</i></p> <p><input type="checkbox"/> Contingent  <input type="checkbox"/> Unliquidated  <input type="checkbox"/> Disputed</p> <p>Basis for the claim: <b>Trade Creditor - materials or services</b></p> <p>Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p>	<b>\$1,699.07</b>
3.43	<p>Nonpriority creditor's name and mailing address  <b>Testa Produce, Inc.</b>  <b>O2nd Dept 2105</b>  <b>PO Box 5905</b>  <b>Carol Stream, IL 60197-5905</b></p> <p>Date(s) debt was incurred _____</p> <p>Last 4 digits of account number _____</p>	<p>As of the petition filing date, the claim is: <i>Check all that apply.</i></p> <p><input type="checkbox"/> Contingent  <input type="checkbox"/> Unliquidated  <input type="checkbox"/> Disputed</p> <p>Basis for the claim: <b>Trade Creditor - materials or services</b></p> <p>Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p>	<b>\$12,622.23</b>
3.44	<p>Nonpriority creditor's name and mailing address  <b>Town Bank</b>  <b>9801 W. Higgins Road</b>  <b>Des Plaines, IL 60018</b></p> <p>Date(s) debt was incurred <u>2/24/2021</u></p> <p>Last 4 digits of account number <u>4083</u></p>	<p>As of the petition filing date, the claim is: <i>Check all that apply.</i></p> <p><input type="checkbox"/> Contingent  <input type="checkbox"/> Unliquidated  <input type="checkbox"/> Disputed</p> <p>Basis for the claim: <b>PPP Loan</b></p> <p>Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p>	<b>\$383,555.68</b>
3.45	<p>Nonpriority creditor's name and mailing address  <b>Towne Park LLC</b>  <b>PO Box 79349</b>  <b>Baltimore, MD 21279-0349</b></p> <p>Date(s) debt was incurred _____</p> <p>Last 4 digits of account number _____</p>	<p>As of the petition filing date, the claim is: <i>Check all that apply.</i></p> <p><input type="checkbox"/> Contingent  <input type="checkbox"/> Unliquidated  <input type="checkbox"/> Disputed</p> <p>Basis for the claim: <b>Trade Creditor - materials or services</b></p> <p>Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p>	<b>\$9,000.00</b>
3.46	<p>Nonpriority creditor's name and mailing address  <b>Turano Baking Company</b>  <b>6501 West Roosevelt Road</b>  <b>Berwyn, IL 60402</b></p> <p>Date(s) debt was incurred _____</p> <p>Last 4 digits of account number _____</p>	<p>As of the petition filing date, the claim is: <i>Check all that apply.</i></p> <p><input type="checkbox"/> Contingent  <input type="checkbox"/> Unliquidated  <input type="checkbox"/> Disputed</p> <p>Basis for the claim: <b>Trade Creditor - materials or services</b></p> <p>Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p>	<b>\$1,068.18</b>

Debtor	Wisconsin & Milwaukee Hotel LLC	Case number (if known)	24-21743
3.47	Nonpriority creditor's name and mailing address <b>UMF Corporation</b> 3600 Commercial Avenue Northbrook, IL 60062	As of the petition filing date, the claim is: Check all that apply.	<b>\$228.75</b>
	Date(s) debt was incurred _____	<input type="checkbox"/> Contingent	
	Last 4 digits of account number _____	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
3.48	Nonpriority creditor's name and mailing address <b>Urban Elevator - Wisconsin</b> PO Box 70 Berwyn, IL 60402	As of the petition filing date, the claim is: Check all that apply.	<b>\$1,760.00</b>
	Date(s) debt was incurred _____	<input type="checkbox"/> Contingent	
	Last 4 digits of account number _____	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
3.49	Nonpriority creditor's name and mailing address <b>US Foodservice Inc.</b> W137N9245 WI-45 Menomonee Falls, WI 53051	As of the petition filing date, the claim is: Check all that apply.	<b>\$22,407.18</b>
	Date(s) debt was incurred _____	<input type="checkbox"/> Contingent	
	Last 4 digits of account number _____	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
3.50	Nonpriority creditor's name and mailing address <b>Valentine Coffee</b> 5918 W. Vliet Street Milwaukee, WI 53208	As of the petition filing date, the claim is: Check all that apply.	<b>\$410.40</b>
	Date(s) debt was incurred _____	<input type="checkbox"/> Contingent	
	Last 4 digits of account number _____	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
3.51	Nonpriority creditor's name and mailing address <b>Vistar Corporation</b> 16639 Gale Way Avenue Hacienda Heights, CA 91745	As of the petition filing date, the claim is: Check all that apply.	<b>\$2,576.19</b>
	Date(s) debt was incurred _____	<input type="checkbox"/> Contingent	
	Last 4 digits of account number _____	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
3.52	Nonpriority creditor's name and mailing address <b>Wave Renovations LLC</b> 731 N. Jackson Street Suite 420 Milwaukee, WI 53202	As of the petition filing date, the claim is: Check all that apply.	<b>\$449,000.00</b>
	Date(s) debt was incurred <u>1/22/2020, 2/28/2020,</u> <u>6/9/2020, 6/30/2020</u>	<input type="checkbox"/> Contingent	
	Last 4 digits of account number <u>None</u>	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Operating Loan</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
3.53	Nonpriority creditor's name and mailing address <b>Winter Services LLC</b> 5343 N. 118th Court Milwaukee, WI 53225	As of the petition filing date, the claim is: Check all that apply.	<b>\$350.00</b>
	Date(s) debt was incurred _____	<input type="checkbox"/> Contingent	
	Last 4 digits of account number _____	<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
		Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	

Debtor **Wisconsin & Milwaukee Hotel LLC**

Case number (if known) **24-21743**

Name

3.54	Nonpriority creditor's name and mailing address <b>Wisconsin Hotel &amp; Lodging 125 N. Executive Drive Suite 206 Brookfield, WI 53005</b>	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$2,050.00</b>
		<input type="checkbox"/> Contingent	
		<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
	Date(s) debt was incurred _____	Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
	Last 4 digits of account number _____		
3.55	Nonpriority creditor's name and mailing address <b>Wolf's Dry Cleaners 1354 N. Seventh Street Milwaukee, WI 53205</b>	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$2,280.18</b>
		<input type="checkbox"/> Contingent	
		<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
	Date(s) debt was incurred _____	Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
	Last 4 digits of account number _____		
3.56	Nonpriority creditor's name and mailing address <b>Zone Mechanical North LLC 731 County Road DDD Suite 300 Wrightstown, WI 54180</b>	As of the petition filing date, the claim is: <i>Check all that apply.</i>	<b>\$2,008.15</b>
		<input type="checkbox"/> Contingent	
		<input type="checkbox"/> Unliquidated	
		<input type="checkbox"/> Disputed	
		<b>Basis for the claim: Trade Creditor - materials or services</b>	
	Date(s) debt was incurred _____	Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
	Last 4 digits of account number _____		

**Part 3: List Others to Be Notified About Unsecured Claims**

4. List in alphabetical order any others who must be notified for claims listed in Parts 1 and 2. Examples of entities that may be listed are collection agencies, assignees of claims listed above, and attorneys for unsecured creditors.

If no others need to be notified for the debts listed in Parts 1 and 2, do not fill out or submit this page. If additional pages are needed, copy the next page.

Name and mailing address

On which line in Part 1 or Part 2 is the related creditor (if any) listed?

Last 4 digits of account number, if any

**Part 4: Total Amounts of the Priority and Nonpriority Unsecured Claims**

5. Add the amounts of priority and nonpriority unsecured claims.

5a. Total claims from Part 1

<b>Total of claim amounts</b>		
5a.	\$	<b>0.00</b>
5b.	+	\$ <b>2,435,339.94</b>
5c.	\$	<b>2,435,339.94</b>

5b. Total claims from Part 2

5c. Total of Parts 1 and 2  
Lines 5a + 5b = 5c.

Fill in this information to identify the case:

Debtor name Wisconsin & Milwaukee Hotel LLC

United States Bankruptcy Court for the: EASTERN DISTRICT OF WISCONSIN

Case number (if known) 24-21743

Check if this is an amended filing

## Official Form 206G

### Schedule G: Executory Contracts and Unexpired Leases

12/15

Be as complete and accurate as possible. If more space is needed, copy and attach the additional page, number the entries consecutively.

1. Does the debtor have any executory contracts or unexpired leases?

No. Check this box and file this form with the debtor's other schedules. There is nothing else to report on this form.

Yes. Fill in all of the information below even if the contacts of leases are listed on *Schedule A/B: Assets - Real and Personal Property* (Official Form 206A/B).

2. List all contracts and unexpired leases

State the name and mailing address for all other parties with whom the debtor has an executory contract or unexpired lease

2.1. State what the contract or lease is for and the nature of the debtor's interest

SIP (telephone) services contract; Contract is either with, or for the benefit of, the Debtor.

State the term remaining

6 months

Access One, Inc.  
820 W. Jackson Blvd.  
6th Floor  
Chicago, IL 60607

List the contract number of any government contract

2.2. State what the contract or lease is for and the nature of the debtor's interest

Services contract - Beverage gas; Contract is either with, or for the benefit of, the Debtor.

State the term remaining

1 year

Airgas USA, LLC  
3101 Stafford Drive  
Charlotte, NC 28208

List the contract number of any government contract

2.3. State what the contract or lease is for and the nature of the debtor's interest

Services contract - HOTSOS preventative maintenance; Contract is either with, or for the benefit of, the Debtor.

State the term remaining

Expires 4/30/24

Amadeus Hospitality Americas, Inc.  
75 New Hampshire Avenue  
Portsmouth, NH 03801

List the contract number of any government contract

**Additional Page if You Have More Contracts or Leases****2. List all contracts and unexpired leases****State the name and mailing address for all other parties with whom the debtor has an executory contract or unexpired lease**

2.4. State what the contract or lease is for and the nature of the debtor's interest

**Reservation of flight personnel rooms;  
Contract is either with, or for the benefit of, the Debtor.**

State the term remaining

**Month to month**

List the contract number of any government contract

**American Airlines, Inc.  
1 Skyview Drive  
Fort Worth, TX 76155**

2.5. State what the contract or lease is for and the nature of the debtor's interest

**Music licensing contract;  
Contract is either with, or for the benefit of, the Debtor.**

State the term remaining

**Month to month**

List the contract number of any government contract

**ASCAP  
2 Music Square West  
Nashville, TN 37203**

2.6. State what the contract or lease is for and the nature of the debtor's interest

**Services contract -  
kitchen hood cleaning;  
Contract is either with, or for the benefit of, the Debtor.**

State the term remaining

**Month-to-month**

List the contract number of any government contract

**Averus Inc.  
3851 Clearview Court  
Gurnee, IL 60031**

2.7. State what the contract or lease is for and the nature of the debtor's interest

**Copier services;  
Contract is either with, or for the benefit of, the Debtor.**

State the term remaining

**Expires 12/31/2025**

List the contract number of any government contract

**Canon Solutions America, Inc.  
425 Martingale Road  
Schaumburg, IL 60173**

2.8. State what the contract or lease is for and the nature of the debtor's interest

**Supply contract -  
kitchen uniforms;  
Contract is either with, or for the benefit of, the Debtor.**

State the term remaining

**Expires 6/23/2025**

List the contract number of any government contract

**CINTAS Corporation No. 2  
6415 N. 2nd Street  
Milwaukee, WI 53223**

**Additional Page if You Have More Contracts or Leases****2. List all contracts and unexpired leases****State the name and mailing address for all other parties with whom the debtor has an executory contract or unexpired lease**

2.9. State what the contract or lease is for and the nature of the debtor's interest

**Services contract - hotel security; Contract is either with, or for the benefit of, the Debtor.**  
**Month to month**

State the term remaining

**Elite Protection Specialist, LLC**  
**PO Box 185**  
**Pewaukee, WI 53072**

List the contract number of any government contract

2.10. State what the contract or lease is for and the nature of the debtor's interest

**Services contract - EPIK (telephone); Contract is either with, or for the benefit of, the Debtor.**  
**Expires 9/13/2024**

State the term remaining

**Granite Telecommunications**  
**100 Newport Ave Ext**  
**Quincy, MA 02171**

List the contract number of any government contract

2.11. State what the contract or lease is for and the nature of the debtor's interest

**Consulting and Asset Management Agreement**

State the term remaining

**JS Asset Management LLC**  
**731 N. Jackson Street**  
**Suite 420**  
**Milwaukee, WI 53202**

List the contract number of any government contract

2.12. State what the contract or lease is for and the nature of the debtor's interest

**Services contract - Reader Board Services; Contract is either with, or for the benefit of, the Debtor.**  
**Month to month**

State the term remaining

**Knowland Group, LLC**  
**1735 N. Lynn Street**  
**Arlington, VA 22209**

List the contract number of any government contract

2.13. State what the contract or lease is for and the nature of the debtor's interest

**Contract for brand marketing; Contract is either with, or for the benefit of, the Debtor.**  
**Month to month**

State the term remaining

**Marriott International Inc.**  
**10400 Fernwood road**  
**Bethesda, MD 20817**

List the contract number of any government contract

**Additional Page if You Have More Contracts or Leases****2. List all contracts and unexpired leases****State the name and mailing address for all other parties with whom the debtor has an executory contract or unexpired lease**

2.14. State what the contract or lease is for and the nature of the debtor's interest  
**Franchise Agreement**

State the term remaining

**Marriott International Inc.**  
10400 Fernwood road  
Bethesda, MD 20817

List the contract number of any government contract

2.15. State what the contract or lease is for and the nature of the debtor's interest  
**Services contract - F&B reservations and marketing; Contract is either with, or for the benefit of, the Debtor.**

State the term remaining

**Month to month****OpenTable, Inc.**  
1 Montgomery Street  
San Francisco, CA 94104

List the contract number of any government contract

2.16. State what the contract or lease is for and the nature of the debtor's interest  
**Services contract - public area music programming; Contract is either with, or for the benefit of, the Debtor.**

State the term remaining

**Expires 5/31/2025****Prescriptive Music, LLC**  
5900 Canoga Avenue  
Suite 300  
Woodland Hills, CA 91367

List the contract number of any government contract

2.17. State what the contract or lease is for and the nature of the debtor's interest  
**Services contract - associate distress devices; Contract is either with, or for the benefit of, the Debtor.**

State the term remaining

**Relay Inc.**  
4200 Six Forks Road  
Suite 1800  
Raleigh, NC 27609

List the contract number of any government contract

2.18. State what the contract or lease is for and the nature of the debtor's interest  
**Services contract - fryer oil and filtration services; Contract is either with, or for the benefit of, the Debtor.**

State the term remaining

**Month to month****Restaurant Technologies, Inc.**  
2250 Pilot Knob Road  
Suite 100  
Saint Paul, MN 55120

List the contract number of any government contract

**Additional Page if You Have More Contracts or Leases****2. List all contracts and unexpired leases****State the name and mailing address for all other parties with whom the debtor has an executory contract or unexpired lease**

2.19. State what the contract or lease is for and the nature of the debtor's interest

**Services contract - contract licensing; Contract is either with, or for the benefit of, the Debtor.**

State the term remaining

**Month to month****SESAC**

List the contract number of any government contract

**35 Music Square East  
Nashville, TN 37203**

2.20. State what the contract or lease is for and the nature of the debtor's interest

**Services contract - marketing services; Contract is either with, or for the benefit of, the Debtor.**

State the term remaining

**Expires 12/31/2024****Tambourine  
100 W. Cypress Creek Road  
Suite 550  
Fort Lauderdale, FL 33309**

List the contract number of any government contract

2.21. State what the contract or lease is for and the nature of the debtor's interest

**Services contract - Valet parking services; Contract is either with, or for the benefit of, the Debtor.**

State the term remaining

**Expires 1/1/2026****Towne Park, LLC  
555 E. North Lane  
Suite 5020  
Conshohocken, PA 19428**

List the contract number of any government contract

2.22. State what the contract or lease is for and the nature of the debtor's interest

**Services contract - AC maintenance agreement; Contract is either with, or for the benefit of, the Debtor.****Expires 6/11/2024****Trane U.S.  
234 West Florida Street  
Milwaukee, WI 53204**

State the term remaining

List the contract number of any government contract

2.23. State what the contract or lease is for and the nature of the debtor's interest

**Services contract - marketing services; Contract is either with, or for the benefit of, the Debtor.****Month to month****Trip Advisor LLC  
400 - 1st Avenue  
Needham Heights, MA 02494**

State the term remaining

List the contract number of any government contract

**Additional Page if You Have More Contracts or Leases****2. List all contracts and unexpired leases****State the name and mailing address for all other parties with whom the debtor has an executory contract or unexpired lease**

2.24. State what the contract or lease is for and the nature of the debtor's interest

**Services contract -  
Elevator maintenance services; Contract is either with, or for the benefit of, the Debtor.**  
Expires 6/30/2027

State the term remaining

List the contract number of any government contract

**Urban Elevator Service, LLC  
4830 WEst 16th Street  
Cicero, IL 60804**

2.25. State what the contract or lease is for and the nature of the debtor's interest

**Services contract -  
Temporary/contract labor; Contract is either with, or for the benefit of, the Debtor.**  
Month to month

State the term remaining

List the contract number of any government contract

**V&J Hospitality Services, LLC  
443 Parkridge Drive  
Pittsburgh, PA 15235**

2.26. State what the contract or lease is for and the nature of the debtor's interest

**Services contract -  
Advertising; Contract is either with, or for the benefit of, the Debtor.**  
Month to month

State the term remaining

List the contract number of any government contract

**Wedding Pages LLC  
462 Broadway  
6th Floor  
New York, NY 10013**

2.27. State what the contract or lease is for and the nature of the debtor's interest

**Management Contract**

State the term remaining

List the contract number of any government contract

**White Lodging Management Corp.  
701 83rd Avenue  
#17  
Merrillville, IN 46410**

United States Bankruptcy Court  
Eastern District of Wisconsin

In re Wisconsin & Milwaukee Hotel LLC

Debtor(s)

Case No. 24-21743  
Chapter 11

**LIST OF EQUITY SECURITY HOLDERS**

Following is the list of the Debtor's equity security holders which is prepared in accordance with rule 1007(a)(3) for filing in this Chapter 11 Case

Name and last known address or place of business of holder	Security Class	Number of Securities	Kind of Interest
<b>FORE Investments LLC</b> 731 N. Jackson Street Suite 900 Milwaukee, WI 53202			<b>LLC Member - 0.01% interest</b>
<b>Jackson Street Management LLC</b> 731 N. Jackson Street Suite 4320 Milwaukee, WI 53202-4612			<b>LLC Member - 99.9% interest</b>

**DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP**

I, **Mark Flaherty, Manager of Jackson Street Management, LLC**, manager of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date May 6, 2024

Signature /s/ Mark Flaherty

**Jackson Street Management, LLC**  
**By: Mark Flaherty, Manager**

*Penalty for making a false statement of concealing property:* Fine of up to \$500,000 or imprisonment for up to 5 years or both.  
18 U.S.C. §§ 152 and 3571.